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June 1, 2000

VIA HAND DELIVERY

Blanca S. Bayo Director, Division of Records & Reporting Florida Public Service Commission Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 Atlanta Boston Bradenton Chicago Fort Lauderdale Jacksonville Lakeland Melbourne Mexico City Miami New York Northern Virginia Orlando Providence San Francisco St. Petersburg Tallahassee Tampa Washington, D.C. West Palm Beach Representative Offices: Buenos Aires Tal Aviv

KAREN D. WALKER 850-425-5612

ORIGINAL OF 22 25

Re: Complaint and petition by Lee County Electric Cooperative, Inc. for an investigation of the rate structure of Seminole Electric Cooperative, Inc., Docket No. 981827-EC

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of:

Lee County Electric Cooperative, Inc.'s Objections to Seminole $\mathcal{D} = \mathcal{D} =$

Lee County Electric Cooperative, Inc.'s Objections To, and Requests for Clarification of, Seminole Electric Cooperative, Inc.'s First Request for Production of Documents.

For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP

Karen D. Walker

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Blanca Bayo June 1, 2000 Page 2

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KDW:kjg Enclosure

cc: Richard Melson William Cochran Keating Robert A. Mora Timothy Woodbury

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and petition by Lee County Electric Cooperative, Inc. for an investigation of the rate structure of Seminole Electric Cooperative, Inc.

Docket No. 981827-EC Filed: June 1, 2000

ORIGINAL

LEE COUNTY ELECTRIC COOPERATIVE, INC.'S OBJECTIONS TO SEMINOLE ELECTRIC COOPERATIVE, INC.'s FIRST SET OF INTERROGATORIES

Lee County Electric Cooperative, Inc. ("LCEC"), pursuant to Rule 28-

106.206, Florida Administrative Code, Rule 1.340, Florida Rules of Civil

Procedure, and the Order on Procedure issued in this docket on April 4, 2000,

hereby submits its objections to Seminole Electric Cooperative, Inc.'s

("Seminole"'s) First Set of Interrogatories to LCEC.

General Objections

LCEC objects to each of the interrogatories to the extent that they would require the disclosure of privileged information, including privileged attorney-client communications, work product and trial preparation materials or other privileged information.

LCEC further objects to providing any information to Seminole which contains proprietary confidential business information. Such proprietary confidential business information may be made available to Seminole upon execution of an appropriate protective agreement, provided that disclosure of the information to Seminole will not harm LCEC. Counsel for Seminole

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should contact counsel for LCEC to arrange for the execution of such an agreement.

Respectfully submitted,

D. Bruce May Florida Bar No. 354473 Karen D. Walker Florida Bar No. 0982921 Holland & Knight LLP Post Office Drawer 810 Tallahassee, Florida 32302 (850) 224-7000

Attorneys for Lee County Electric Cooperative, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the

foregoing was furnished by hand delivery to Richard Melson, Hopping, Green, Sams & Smith, P.A., 123 South Calhoun Street, Tallahassee, Florida 32301; and William Cochran Keating, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850; and by United States Mail to Robert A. Mora, Allen Law Firm, Post Office Box 2111, Tampa, Florida 33601; and Timothy Woodbury, Seminole Electric Cooperative, Inc., Post Office Box 272000, Tampa, Florida 33688-2000 all on this 1st day of June, 2000.

Karen D. Walker

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